

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 24-cr-112

vs.

IAN OLSON,

Defendant.

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

Ian Olson moves this court to amend his conditions of release to allow him to travel out of the district on Thursday, June 20, 2024, from 1:30 p.m. to 3:00 p.m. As grounds for this motion, undersigned counsel states the following:

1. On May 29, 2024, the government obtained an indictment charging Mr. Olson with knowingly possessing a firearm and ammunition after being convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of 18 U.S.C. 922(g)(1) and 924(a)(8). Dkt. 2. Mr. Olson was arraigned on June 13, 2024, before Magistrate Judge Nancy Joseph, and entered a not guilty plea. Dkt. 5.

2. Judge Joseph entered an order setting Mr. Olson's very strict conditions of release. Dkt. 7. Among these conditions were the requirement to abide by the bond conditions the Waukesha County Circuit Court set in his case¹ if he were released (including to submit to testing for prohibited substances) and home incarceration.

¹ *State of Wisconsin v. Ian Olson*, Waukesha County Case No. 2023CF1647

3. In order to abide by the conditions set in his Waukesha County case, Mr. Olson must travel to the offices of the Wisconsin Correctional Services (“WCS”) in Waukesha for testing on Thursday, June 20, 2024, at 2:00 p.m. Their office, across the street from the Waukesha County Courthouse on Moreland Boulevard in Waukesha, is 12 miles from Mr. Olson’s home and takes about 20 minutes each way to drive. Though Mr. Olson’s meeting at WCS should be brief, to account for any time waiting in WCS for that appointment, Mr. Olson requests that this Court allow a total of 90 minutes for this trip.

4. Thus, Mr. Olson asks that the Court allow him to leave his house not sooner than 1:30 p.m. on June 20, 2024, and return not later than 3:00 p.m. on June 20, 2024. Mr. Olson acknowledges that he must travel directly to and from his home and the WCS offices and otherwise abide by all conditions set by both the Waukesha County Circuit Court and this Court.

5. Undersigned counsel has communicated with Assistant United States Attorney Ben Proctor, who indicated that the government does not object to this request.

For these reasons, Ian Olson moves this court to amend his conditions of release to allow him to travel out of the district on Thursday, June 20, 2024, from 1:30 p.m. to 3:00 p.m., in order to comply with his Waukesha County conditions of release.

Dated at Milwaukee, Wisconsin, this 18th day of June, 2024.

Respectfully submitted,

/s/ John W. Champion

John W. Champion, WI Bar #1002697

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